

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

United States of America,	:	
	:	Case No.: 1:20-cr-077
Plaintiff,	:	
v.	:	Judge Timothy S. Black
	:	
Matthew Borges,	:	
	:	
Defendant.	:	

DEFENDANT BORGES' RESPONSE TO
GOVERNMENT'S MOTION *IN LIMINE* TO PRECLUDE
REFERENCES TO AND COMMENTS REGARDING
DISCOVERY IN THE PRESENCE OF THE JURY

Defendant, Matthew Borges ("Borges"), through counsel, hereby provides his Response to the Government's Motion *in Limine* to Preclude References to and Comments Regarding Discovery in the Presence of the Jury. (R.137).

Borges does not intend to present testimony or evidence regarding discovery disputes, and related motions, in front of the jury. However, that is not to say that Borges will not elicit testimony regarding what evidence was gathered, how that was accomplished, or what types of evidence may be absent, all of which depends on the evidence elicited at trial.

With those reservations, the Government's motion is moot.

Respectfully submitted,

/s/ Karl H. Schneider

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Response was electronically filed with the Clerk of the United States District Court using the CM/ECF system on November 28, 2022, which will send notification of such filing to all attorneys of record including Assistant United States Attorneys Emily Glatfelter and Matthew Singer.

/s/ Karl H. Schneider

Karl H. Schneider (0012881), Lead Counsel